

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11  
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DELPHI CORPORATION, et al., : Case No. 05-44481 (RDD)  
:  
Debtors. : (Jointly Administered)  
:  
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**MOTION FOR PAYMENT OF ADMINISTRATIVE  
CLAIM/TAXES INCURRED POST-PETITION**

CITY OF VANDALIA, OHIO ("Vandalia"), by counsel, SARAH B. CARTER,  
moves the Court for payment of administrative claims and states as follows:

1. On October 8, 2005, the Debtors filed voluntary petitions under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1330, as then amended, in the United States Bankruptcy Court for the Southern District of New York. The Debtors continue to operate their business and manage their properties as Debtors-in-possession under the Bankruptcy Code.

2. In March of 2007, DAS LLC filed its 2006 tax reconciliation with Vandalia, which established an outstanding balance of \$35,687.53 (see attached account statement) ("Administrative Claim"), which was due on or before January 31, 2007 and has not been paid.

3. The Administrative Claim is not subject to any setoff or counterclaim, and Vandalia holds no security for such Administrative Claim.

4. Vandalia is entitled to payment of this Administrative Claim under 11 U.S.C. § 503(b) plus any penalties or interest owed on said Administrative Claim.

WHEREFORE, Vandalia prays for an order of this Court directing payment of administrative expenses in the amount of Thirty Five Thousand Six Hundred Eighty-Seven and

53/100 and all other just and proper relief.

/s/ Sarah B. Carter

Sarah B. Carter (0079889, OH)  
PICKREL, SCHAEFFER AND EBELING  
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Dayton, Ohio 45423-2700  
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Attorneys for City of Vandalia, Ohio

**CERTIFICATE OF SERVICE**

The undersigned certifies and affirms that on March 4, 2008, she electronically filed with the clerk of the Court a copy of the Motion for Payment of Administrative Claim/Taxes Incurred Post-Petition on behalf of Creditor CITY OF VANDALIA, OHIO ("Motion") using the ECF system, which system will send an electronic copy of same to those ECF participants registered in the above-referenced matter. The undersigned also certifies and affirms that a copy of the Motion was also mailed by regular U.S. mail, postage pre-paid, to the following at their business address set forth below in accordance with the Court's Notice of Procedures:

- |                                                                                                                                                                            |                                                                                                                                                                                               |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. Delphi Automotive Systems, LLC<br>5725 Delphi Drive<br>Troy, MI 48098<br>Attn: Legal Staff                                                                              | 2. Delphi Corporation<br>5725 Delphi Drive<br>Troy, MI 48098<br>Attn: General Counsel                                                                                                         |
| 3. Counsel to Debtors<br>Skadden, Arps, Slate,<br>Meagher & Flom, LLP<br>333 West Wacker Drive, Suite 2100<br>Chicago, IL 60606                                            | 4. Counsel for the Agent under<br>the Post-Petition Credit Facility<br>Davis Polk & Wardwell<br>450 Lexington Avenue<br>New York, NY 10017<br>Attn: Donald Bernstein<br>and Brian Resnick     |
| 5. Counsel for the Official Committee<br>of Unsecured Creditors<br>Latham & Watkins, LLP<br>885 Third Avenue<br>New York, NY 10022<br>Attn: Robert Rosenberg & Mark Broude | 6. Counsel for the Official Committee<br>of Equity Security Holders<br>Fried, Frank, Harris, Shriver &<br>Jacobson, LLP<br>One New York Plaza<br>New York, NY 10004<br>Attn: Bonnie Steingart |
| 7. Office of the U.S. Trustee<br>Southern District of New York<br>33 Whitehall Street, Suite 2100<br>New York, NY 10004<br>Attn: Alicia M. Leonhard                        | 8. The Honorable Robert D. Drain<br>U.S. Bankruptcy Judge<br>U.S. Bankruptcy Court<br>Southern District of New York<br>One Bowling Green, Room 632<br>New York, NY 10004                      |
| 9. E. Todd Sable<br>Seth A. Drucker<br>2290 First National Building<br>660 Woodward Ave., Suite 2290<br>Detroit, MI 48226-3506                                             |                                                                                                                                                                                               |

/s/ Sarah B. Carter  
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Attorneys for City of Vandalia, Ohio

**Tax Master File Maintenance**

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**Account** 005036 W

**City Cd** VAND

**Home**

**Fed#** 38-3547664

**Name** DELPHI AUTOMOTIVE SYSTEMS

**Add1** HUMAN RESOURCES LLC

**Add2** P O BOX 62410

**City** PHOENIX

**St** AZ ▼ **Zip** 85082

**Tele** 602-797-5258

**Inact Dt** [01-01-2002]

**Fye** 12-31-08

**Pays** 12

**Status** Y

**Local**

**Alt#**

**Name**

**Alt#**

**Name**

**Alt#**

**Name**

**Ltr** 11-10-2005

**Activity** 02-27-2008

**Audit**

RA	X	Year	C/O & Ref	Misc+Je+CT	Reconcile	Pen/Int	Payments	Balance	Acct Bal
R		2008	0.00	0.00	239,573.52		239,573.52	0.00	35687.53
R		2007	0.00	0.00	530,871.67		530,871.67	0.00	
R		2006	0.00	0.00	522,926.85	7,587.11	494,826.43	35687.53	
R		2005	0.00	0.00	474,233.92		474,233.92	0.00	
R		2004	0.00	0.00	413,722.33	0.00	413,722.33	0.00	
R		2003	0.00	0.00	583,879.61	0.00	583,879.61	0.00	
R		2002	0.00	0.00	594,757.93	0.00	594,757.93	0.00	

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